



49 Woodside Street, Stamford, CT 06902

February 18, 2013

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
1 Congress Street, Suite 1100 - CPT
Boston, Massachusetts 02114-2023

RE: 1st Revision to PCB Cleanup and Disposal Notification
Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, CT

Dear Ms. Tisa:

I am submitting the following answers and revisions (**in bold**) to the PCB cleanup and disposal notification for the Joseph A DePaolo Middle School at the above referenced location, based on your two e-mails dated February 1, 2013:

FEBRUARY 1, 2013 (3:40 PM)

1. Page 36. There is reference to > 50 ppm glazing. I don't believe there was any glazing with > 50 ppm identified at DePaolo. **The mention of glazing in this section has been removed.**
2. Page 36. The only non-porous building systems appear to be the univents which had an interior mastic/paper. **This paragraph has been changed to say metal non-porous unit ventilators instead of non-porous building systems.**
3. On the diagrams containing the proposed abatement work, there are references to 2 caulks which will be removed/disposed of as a > 50 ppm PCB waste: the corner wall caulk and caulk located between the metal columns and the cinderblock. In the PCB Source Material table, I am not readily finding caulk samples associated with the metal column/cinderblock. **The metal column caulk is similar to the corner wall caulk in color and textured and is assumed to be the same.**
4. As mentioned in previous e-mails, some of the same questions I had on Kennedy are applicable at DePaolo. For example, a figure or figures should be provided identifying which walls will be removed as part of the expansion (alternatively, which walls, and thus the vapor barrier, will remain) **This has been answered below #21 (h).** Also, it would be helpful if the *Location and Extent table* could have a column showing the # of verification samples proposed for the various line items, if applicable. It may also be helpful to identify on this same table, those products that are a *PCB bulk product waste* or an *Excluded PCB Product* for clarification. I say this because I know that the Town is proposing to remove the *Excluded PCB Products* under the CT RSR requirements, but I don't believe verification sampling is proposed in the *Excluded PCB Product* areas. Thus, it may be helpful to show the classifications on the *Location and Extent table* again. **The Location and Extent Table has been revised and provided. See answers below in Kennedy/DePaolo comments for other questions you had for Kennedy that applied to DePaolo as well..**
5. Also, could you provide another clean copy of the *PCB Source Material & Building Material Sampling Location & Results* table for DePaolo (pages 11-13)? I inadvertently ruined my clean copy when I was reviewing the document. An email with the table attached would be fine. **A new copy has been provided.**

February 01, 2013 (12:50 PM)

6. Based on my initial review of the plan, it appears that you have indicated in the *PCB Source Material & Building Material Sample Location & Results table* (the Table) that the majority of the identified products are an *Excluded PCB Product*. This appears to be decidedly different from the Kennedy MS where many of the products were in fact > 50 ppm. **This is correct, the buildings were constructed approximately 3-4 years apart and there is a distinct difference in the sample results. DePaolo has a significant quantity of materials that are low level PCBs.**

7. However, a few of those products are approaching the 50 ppm regulatory limit for this classification, such as the interior glass door caulk. Thus, for these types of products of these it would be helpful to justify why you believe the sampling that was conducted is representative to conclude that all these materials are in fact an *Excluded PCB Product*. **Three separate sample locations were selected for this material and all results were >1 PPM but < 50 PPM, with an average of 32.67 PPM. Based on these results, the age of construction, the fact that there are no know modifications to the building and the fact that the majority of the sampling performed at the site resulted in PCB levels >1 PPM but less than 50 PPM I feel that it is justified to conclude that these materials are an *Excluded PCB Product*.**

8. With that said, I was reviewing the Table and the associated drawings and am identifying some issues. I've identified the ones I found below. Given this, I would request that the Table and drawings be reviewed to confirm the accuracy of the information shown therein. At this point, I'm not going to review the Table or drawings further until you have an opportunity to review. **I have reviewed the tables and drawings and made some minor modifications for accuracy. Each item is addressed below and all revised documents have been provided.**

9. A PCB concentration was not shown for Interior Door Caulk. **This caulk would have been applied on the door at the same time the exterior caulk was applied and was assumed to be the same as that caulk. Sampling of building materials directly at the caulk line showed no levels of PCBs present which is consistent with the exterior sample results.**

10. Sample INT-04 is indicated to be located at a glass door; however, it does not appear so on the drawing. **This sample is correct on the drawing. It was a wall sample from Room 239. I have made the change in the table.**

11. Sample 081412-27 is indicated to be an interior glass door caulk. However, the building sample located adjacent to this location is indicated to be INT-40. According to the table, INT-40 is located adjacent to an interior door caulk, not a glass door caulk. **Sample 081412-27 was placed in the wrong location and has been adjusted on the sample location map. Sample INT-40 is in the correct location and was collected adjacent to the interior caulk on an exterior door. The revised map has been provided.**

12. The following sample locations are identified to be located within 6 inches of interior corner wall caulk, but do not appear to be as such on drawings A001.1 and A002.1: INT-06, 14, 15, 17, 25, 29, 34, 37. **These samples were collected 6 inches from the metal column caulk on the outer walls. Since the caulk is similar in color and texture to the corner wall caulk, it was assumed to be the same. These samples were collected to determine the outer extent and showed similar results to the corner wall. The wording in the *PCB SOURCE MATERIAL & BUILDING MATERIAL SAMPLE LOCATION & RESULTS table* has been changed to "Six inches from caulk on cinderblock from either the corner wall or metal column"**

13. INT-39 is indicated to be located adjacent to an interior door caulk; however, drawing A001.1 appears to indicate it is on another wall rather than adjacent to the door. **There is a door present where this sample was collected. In the drawing provided the door is faded and hard to see.**

14. It is unclear what the sample matrix is for the following samples:

- A. EXTG-01 through EXTG-03? **The sample matrix here is concrete sidewalk adjacent to the "sidewalk black fill."**
- B. Please clarify what the "sidewalk black fill" is? **This material is placed between the concrete side walk sections as a spacer.**

15. Following sample locations were not found on the drawings (I didn't go through every sample, so there may be others): EXTB-17 & EXTB-23. **I have added them to the EXTB map and have provided the new copy of the map for your review. There were no additional sample locations missing that I could find.**

16. Samples 081412-16 and -17:

- A. Sample 081412-16 and -17 are indicated to be an exterior red door caulk but are shown as a double door on the drawing. Please confirm sample id and location. **Sample ID and location are correct. Please see photos below, the majority of the red doors are double doors.**
- B. Sample -16 has a PCB concentration of 41 ppm, which is a factor of 10x higher than sample -17. Thus, please confirm if other similar doors are present that have similar caulk but were not sampled for PCBs. **There are a total of ten single and double red doors. All doors look identical and the caulk visually appears to be the same.**



- C. EPA also notes that adjacent building substrates located adjacent to sample -16 were not sampled to confirm the PCB concentration. Please clarify why given the PCB concentration in the caulk. **The caulk for the doors was classified as homogeneous based on the color, age and the fact that no samples were found >50PPM. When the building material sampling was performed, locations were selected from each side of the building and from each type of substrate by the inspectors without looking at specific sample results from the initial survey to avoid a biased sampling approach.**

Materials around six of the eighteen exterior doors were sampled and none had detectable levels of PCBs present.

17. Samples 081412-02 and -04 are shown in the same location on the drawing. Please confirm. **This is correct, #4 is a duplicate sample of #2.**

18. Sample 081412-19 is identified to be an expansion joint caulk; however, the drawing appears to show otherwise. Please confirm. **There are small expansion/control joints present under the windows. The sample identification is correct.**

Kennedy/DePaolo Comments

19. It would be helpful if the classification of the various PCB-containing building products could be classified (i.e., PCB bulk product waste or *Excluded PCB Product*). This could be indicated in the Comment Column on the *PCB Source Material & Building Material Sample Location and Results* table. **Please see the revised *PCB Source Material & Building Material Sample Location and Results* table. I have provided it in a separate PDF version.**

20. Figures legends:

- a. PCB-02: It is indicated that steel lintel would be decontaminated or cleaned to a standard of $< 1 \mu\text{g}/\text{cm}^2$.

The standard should be $< 1 \mu\text{g}/100 \text{ cm}^2$. I have noted the error and will make the change.

21. For the table labeled *Location and Extension of the Identified Contaminated Area – 761.61(3)(C)*, the following comments are provided:

- a. It appears that there are no window sills per se, beneath the windows and further than the caulk is between the window frame and brick on the sides and at the window base. Above the window, it does not appear that any brick is in contact with the caulk based on the described materials. Please confirm that these facts are accurate. **The caulk along the top is on the steel lintel, along the sides it is on brick, along the bottom it is on brick. The window unit and the metal sill will first be removed whole for disposal.**

- b. For exterior and interior doors, it appears that the only points of contact for the brick with the caulk are on the door sides/jambs. Please confirm this is correct. **For exterior doors the caulk is along the top on the steel lintel on the exterior only and along the sides on brick on the interior and exterior of the building. For interior doors the caulk is present on the sides of the doors only.**

- c. It is indicated that one full cinderblock will be removed on both sides of the metal column caulk. Please confirm the length of the cinderblock (e.g., 8 inches, 12 inches). **A standard cinderblock is approximately 16 inches long and approximately 8 inches tall.**

- d. Please see previous comment as it applies to the cinderblock on both sides of the corner caulk. **A standard cinderblock is approximately 16 inches long and approximately 8 inches tall.**

- e. This item references the interior of the unit ventilator. Please clarify what the source of the PCB contamination is in these units. Do these units contain any electric oil-filled motors or capacitors? **There was a black coating/mastic on the interior of the units. This was the material that was sampled.**

- f. With respect to the mastic under the wood floor paper/mastic, please clarify specifically what materials will be removed under this line item. **The entire wood floor system and mastic will be removed. Mastic from the floor slab will be removed in its entirety by removing a minimum of 1/32 of an inch of the concrete slab by using a bead blasting machine.**

- g. For the hall doors, EPA would assume that no headers (i.e., lintels) would be present as these are interior doors. However, confirmation is requested. **This is correct.**

- h. With respect to the vapor barrier/mastic to be removed as part of the expansion, it would be helpful if a figure could be provided which specifically identifies those walls that will be removed (and thus the vapor barrier) as part of this project. Please also clarify the quantity of materials that would be removed (i.e., inner cinderblock wall coated with the vapor barrier/mastic). Given that there is a minimum of 3 to 4 inches between the exterior and interior walls, EPA assumes that there would be limited potential for contamination to the exterior wall from the PCB-containing mastic/vapor barrier, but EPA requests clarification on this point. **Please see the attached drawings in PDF with the location of exterior brick and cinderblock wall removal. The total area of removal is as follows:**

- i. **Approximately 21 square feet of wall removal below the two second floor window on the South end of the building where the halls connect to the new addition.**

- ii. **Approximately 60 square feet of wall removal for new double door entrance.**
- iii. **Approximately 600 square feet of wall removal at the current main entrance to create an open stairwell/entry.**

i. There is reference to metal column caulk on this table, but EPA was unable to find this caulk on the *PCB Source material and Building Material Sample Location & Results* table. **The metal column caulk is similar to the corner wall caulk in color and textured and is assumed to be the same.**

22. Page 26. What are the “panels” that are included in the PCB-02 remediation code? **There are no specific panels to speak of. The line is a general line used to ensure that any item associated with the window, door or vent units is completely removed and disposed of.**

23. Page 36. Item 6. HEPA cleaning of the decontaminated building surfaces should be conducted prior to final verification sampling. **Item 6 does discuss the requirement to HEPA vacuum and wet clean all surface adjacent to the material removed. These surfaces should be the only ones exposed since the remainder will be covered with plastic sheeting.**

24. Page 36. Item 7. The air action level **should be the lower** of 2.5 background or 150 µg/m³. **Item 7 has been changed to read “two and a half times (2.5x) the background levels or the EPA set National Ambient Air Quality Standards of 150 µg/m³, which ever is lower, for any”**

25. Page 37, Section 1.5 Exterior Metal Through-Wall Flashing. Item 6. Please clarify if there were any samples collected below the flashing? Is there a potential that PCBs could have migrated over the flashing to the brick below the flashing? **There were no samples collected below the flashing. The metal flashing protrudes from the brick wall and overhangs the roof. It would be highly unlikely that the caulk could migrate to the brick surface under the metal.**

26. Page 39. Section 1.5. It is indicated that > 1 ppm, but < 50 ppm caulk and associated non-porous door systems, metal vent chimney systems, and adjacent cinderblock/brick will be removed and disposed of as a < 50 ppm PCB waste. With reference to the *PCB Source Material & Building Material Sample Location & Results* table:

a. For *non-porous* door caulk, the only data provided to support this proposed disposal is for caulk on the interior glass doors.

i. Please clarify the number of glass doors present at the Site. **14**

ii. No substrate removal adjacent to the interior glass doors is shown in the table. However, in Section 1.5, it is indicated that 1 full cinderblock on each side of the interior hallway doors will be removed. **On the page 27 table it states “ 8” of cinderblock on both door sides/jambs”. I noticed that page 27 and section 1.5 conflicted so I have changed Section 1.5 to match the requirements of the table on page 27.**

1. Are the interior hallway doors the same as the glass doors? **Yes, the hall doors listed in the table on Page 27 are the glass doors.**

2. EPA notes that no data was collected at the proposed removal point for the cinderblock. As such, are any samples proposed to verify removal of all PCBs > 1 ppm? **Yes, verification samples are planned for these areas**

27. Pages 40-41. Verification Inspection and Sampling

a. The following sentence is unclear: “The outer walls associated with the metal columns corner room corners will not be sampled since the PCB containing vapor barrier will remain in place on these surfaces”.

i. EPA does not understand the relationship between sampling of the outer walls in these locations and the vapor barrier. According to the Location and Extent table, there caulk present between the metal columns and the interior adjacent cinderblock. It is unclear if this sentence is written to address the outer brick wall, rather than the cinderblock. If so, and if no PCBs are present on the outer wall, sampling would not be required. Thus, please clarify what actually is being proposed in the above sentence. **There will be interior cinderblock walls remaining that are part of the outer wall system. We are not proposing testing these remaining walls after removal since there will still be PCB containing vapor barrier present on the exterior side. Even if sampling of the**

removal edge proved to be <1 PPM, the block would still be required to be called positive since the vapor barrier will still be present.

ii. It is EPA's understanding that with the exception of certain walls to be removed, the vapor barrier will remain in place. As such, and given that the current configuration of the Site was not provided, it is unclear what walls will be impacted by the renovations and which walls will not.

1. Please provide a sketch of the existing configuration of the Site. **Provided in PDF maps for question/answer #21(h)**

2. Please provide a figure showing the walls that will be removed/disturbed/demolished by the renovations, which thus will include removal and disposal of the vapor barrier. **Provided in the same PDF above.**

3. Please clarify the total square footage of vapor barrier that will remain in-place at the Site following the renovation. **Please see answer #21 h (i – iii) above.**

b. For the metal columns adjacent to PCB caulk > 50 ppm, decontamination of these columns was not discussed in the PCB plan. Please clarify why as it does not appear that any samples were collected to confirm that these columns are not contaminated. **This is an oversight, decontamination of the columns and final wipe sampling will be required and added to the plan.**

28. Pages 38-39. Air Sampling.

a. It is unclear how many remediation zones will be constructed at the Site. Please clarify. **It is not possible to give an answer to this right now. The number of zones required will be determined by the contractor selected and the time frame allowed for each phase.**

b. Please clarify if samples will be collected in common areas, such as the gym, cafeteria, etc. **Yes, two from within each remediation zone, rooms to be determined based on the zones created, and one from remote locations away from the abatement areas.**

c. Please note that the laboratory reporting limit should be < 50 ng/m³ for total homologues and/or congeners, not individual homologues/congeners. **Noted.**

d. Please clarify the age of students and/or other children using this school. **Student ages range from 11-14 years old.**

29. Pages 40. Section 1.9 Waste Management and Disposal.

a. Please clarify the type of disposal facility for each waste stream. If the disposal facility name is known, please identify. **The exact disposal facility will be determined by the contractor that is selected to perform the remediation. Once selected, they will submit their exact disposal locations to you the Contractor Work Plan. The type of disposal facility for each waste stream is as follows:**

PCB Bulk Product Waste:

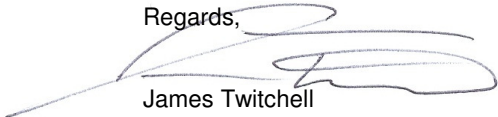
Disposal in a non-TSCA approved landfill that has been permitted, licensed, or registered by a State as a municipal or non-municipal non-hazardous waste landfill.

PCB Wastes containing < 50 ppm:

Disposal in a municipal waste landfill or equivalent.

Thank you in advance for your time. If you have any questions, comments, concerns or would like to discuss this issue further please call me at the office 203-324-2222. Thank you.

Regards,


James Twitchell
HYGENIX Inc.

ATTACHMENT A

**REVISED PCB SOURCE MATERIAL & BUILDING
MATERIAL SAMPLE LOCATIONS & RESULTS TABLE**

**JOSEPH A. DEPAOLO MIDDLE SCHOOL,
385 PLEASANT STREET, SOUTHTON, CT
PCB SOURCE MATERIAL & BUILDING MATERIAL SAMPLE LOCATION & RESULTS**

SOURCE MATERIAL DESCRIPTION	SAMPLE #	RESULT	BUILDING MATERIAL SAMPLE LOCATIONS	SAMPLE #	RESULT	COMMENTS
Exterior Window Caulk	081412-01 081412-02 081412-03 081412-04	2.2 PPM (1254) 3.4 PPM (1254) None Detected 2.5 PPM (1254)	At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.	EXTB-01 EXTB-05 EXTB-07 EXTB-11 EXTB-18 EXTB-23 EXTB-27 EXTB-28 EXTB-32	None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations > 1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 – 469. The material is also asbestos containing. Based on the initial sample results of the caulk, and the building materials at the caulk line no additional verification sampling is proposed after the material is removed.
Exterior Window Glazing	081412-05 081412-06 081412-07 081412-08	None Detected None Detected 0.24 PPM (1254) None Detected	No samples collected since the glazing is contained inside the window system and all samples are <1 PPM.			Glazing/Purity materials with total PCB concentrations > 1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 – 469. The material is also asbestos containing. No additional sampling is proposed after the removal of the windows.
Exterior Vent Caulk	081412-09 081412-10 081412-11	None Detected None Detected None Detected	At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.	EXTB-03 EXTB-04 EXTB-08 EXTB-15 EXTB-15 DUP EXTB-22 EXTB-24 EXTB-30 EXTB-35	None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected	The vent caulk and adjacent building materials did not have PCB levels > 1 PPM. This material is not regulated by the US EPA or CT DEEP for PCBs. The material is asbestos containing. No additional sampling is proposed.
Exterior Metal Double Door Caulk	081412-12 081412-13 081412-14 081412-15 081412-16 081412-17	1.3 PPM (1254) 0.77 PPM (1254) None Detected 2.5 PPM (1254) 41 PPM (1254 & 1268) 3.3 PPM (1254 & 1268)	At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.	EXTB-10 EXTB-13 EXTB-16 EXTB-20 EXTB-21 EXTB-25 INT-24 INT-24 DUP INT-27 INT-31 INT-38 INT-39 INT-40	None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations > 1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 – 469. The material is also asbestos containing. Based on the initial sample results of the caulk and the building materials at the caulk line no additional verification sampling is proposed after the material is removed.
Interior Door Caulk			At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.			
Vertical Expansion Joint Caulk	081412-18 081412-19 081412-20	None Detected 3.4 PPM (1254 & 1268) 2.0 PPM (1268)	At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.	EXTB-02 EXTB-06 EXTB-06 DUP EXTB-09 EXTB-12 EXTB-17 EXTB-19 EXTB-26	None Detected None Detected None Detected None Detected None Detected None Detected None Detected	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations > 1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 – 469. The material is also asbestos containing. Based on the initial sample results of the caulk and the building materials at the caulk line no additional verification sampling is proposed after the material is removed.

PCB cleanup and disposal notification under § 761.61(a) and § 761.79(h)
Joseph A. DePaolo Middle School, Southington, CT

November 2012

Through Wall Metal Flashing Caulk	081412-21 081412-22 081412-23	2.0 PPM (1254) None Detected 2.2 PPM (1254)	At the caulk line on brick or concrete to find the outer extent. Exact locations are on the laboratory results and sample location maps.	EXTB-29 EXTB-31 EXTB-33 EXTB-34	None Detected None Detected None Detected None Detected	proposed after the material is removed. Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations >1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 – 469. The material is also asbestos containing. Based on the initial sample results of the caulk and the building materials at the caulk line no additional verification sampling is proposed after the material is removed.
Sidewalk Black Fill	081412-24 081412-25 081412-26	1.5 PPM (1254) 18 PPM (1254) 4.2 PPM (1254)	Directly Adjacent from fill in concrete to find the outer extent. Exact locations are on the laboratory results and sample location maps.	EXTG-01 EXTG-02 EXTG-03 EXTG-03DUP	None Detected None Detected None Detected None Detected	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations >1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 – 469. The material is also asbestos containing. Based on the initial sample results of the caulk and the building materials at the caulk line no additional verification sampling is proposed after the material is removed.
Interior Glass Door Caulk	081412-27 081412-28 081412-29	22 PPM (1254) 41 PPM (1254) 35 PPM (1254)	Adjacent from caulk on cinderblock to find the outer extent. Exact locations are on the laboratory results and sample location maps.	INT-01 INT-02 INT-03 INT-03 DUP	1.8 PPM (1254) 4.2 PPM (1254) 0.98 PPM (1254) 0.57 PPM (1254)	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations >1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 – 469. The material is also asbestos containing. Post remediation sampling will be performed on each side of each door opening. There will be approximately 28 samples collected.
Interior Corner Wall Caulk	081412-30 081412-31 081412-32	33 PPM (1254) 3,100 PPM (1254) 11 PPM (1254)	Six inches from caulk on cinderblock from either the corner wall or metal column to find the outer extent. Samples were collected randomly from the inner and outer wall of classrooms and hallways. Exact locations are on the laboratory results and sample location maps.	INT-04 INT-05 INT-06 INT-07 INT-08 INT-09 INT-10 INT-11 INT-12 INT-13 INT-14 INT-15 INT-16 INT-17 INT-18 INT-19 INT-20 INT-21 INT-22 INT-23 INT-25 INT-26 INT-26 DUP INT-28	1.8 PPM (1254) 2.0 PPM (1254) 0.54 PPM (1254) 2.9 PPM (1254) 1.3 PPM (1254) 3.5 PPM (1254) 5.1 PPM (1254) 1.3 PPM (1254) 1.2 PPM (1254) 1.5 PPM (1254) 2.4 PPM (1254) 6.4 PPM (1254) 0.73 PPM (1254) 1.9 PPM (1254) 7.7 PPM (1254) 1.7 PPM (1254) 1.6 PPM (1254) 0.92 PPM (1254) 1.5 PPM (1254) 1.2 PPM (1254) 0.69 PPM (1254) 5.0 PPM (1254) 2.5 PPM (1254) 4.3 PPM (1254)	This material is regulated by the US EPA. The material is also asbestos containing. Post remediation sampling will be performed from each corner wall and from each column in each room/location. There will be approximately 572 samples collected.

PCB cleanup and disposal notification under § 761.61(a) and § 761.79(h)
Joseph A. DePaolo Middle School, Southington, CT

November 2012

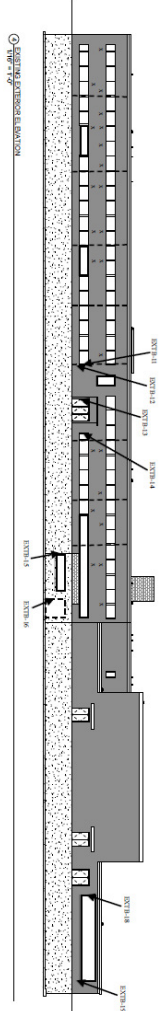
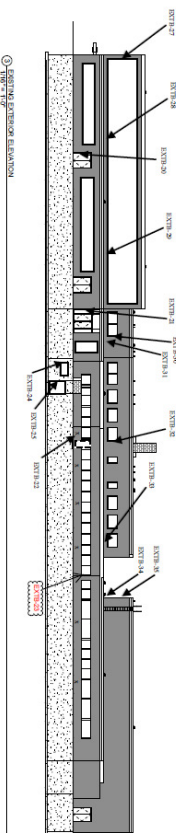
Interior Window Glazing	081412-33 081412-34 081412-35	29 PPM (1254) 2.8 PPM (1254) 4.3 PPM (1254)	No samples collected since the glazing is contained inside the window system	INT-29 INT-30 INT-32 INT-33 INT-34 INT-35 INT-36 INT-37	5.8 PPM (1254) 1.3 PPM (1254) None Detected None Detected None Detected None Detected 0.56 PPM (1254) None Detected	The material is also asbestos containing. No additional sampling is proposed after the removal of the windows.
Outer Wall Vapor Mastic/Paper	083112-08 083112-09 083112-10	3.8 PPM (1254) 120 PPM (1254) 120 PPM (1254)	No samples collected since material is bound between the exterior brick and the interior cinderblock walls.			This material is regulated by the US EPA. The material is applied directly to the block wall. There is a 3'-4" gap between the block and the outer brick wall. The material is also asbestos containing.
Ceramic Floor Vapor Mastic/Paper	083112-05 083112-06 083112-07	7.8 PPM (1242) 2.7 PPM (1242) 2.5 PPM (1242)	No samples collected since the material is not accessible.			Materials with total PCB concentrations > 1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT HCSA 22a-46b - 46g. The material is also asbestos containing. No additional sampling is proposed after the removal of the flooring system and the layer of concrete floor below.
Unit Ventilator Mastic/Paper	083112-11 083112-12 083112-13 083112-14	46 PPM (1254) 75 PPM (1254) 87 PPM (1254) 51 PPM (1254)	No samples were collected the entire unit will be removed and disposed of as PCB waste.			This material is regulated by the US EPA. No additional sampling is proposed since the entire unit is to be removed and disposed of.
Roof Field	083112-01 083112-02 083112-03 083112-04	None Detected None Detected None Detected None Detected				The roofing materials are not PCB containing materials.

JOSEPH A. DEPAOLO MIDDLE SCHOOL,
385 PLEASANT STREET, SOUTHTON, CT
PCB SURROUNDING GROUND SAMPLE LOCATIONS & RESULTS
(There is no direct contact of caulk with surrounding concrete asphalt around the building)

SAMPLE #	SAMPLE DESCRIPTION	RESULT
EXTIG-04	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-05	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-06	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-06 DUP	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-07	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-08	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-09	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-10	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-11	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-12	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-13	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-14	Top 0-0.5" of Concrete at base of building, directly under caulk	None Detected
EXTIG-15	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-16	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-17	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-18	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-19	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-20	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-21	Top 0-0.5" of Concrete at base of building, directly under caulk	None Detected
EXTIG-22	Top 0-0.5" of Asphalt at base of building, directly under caulk	0.32 PPM (1254)
EXTIG-23	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-24	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-25	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-27	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-28	Top 0-0.5" of Asphalt at base of building, directly under caulk	0.45 PPM (1254)
EXTIG-29	Top 0-0.5" of Concrete at base of building, directly under caulk	None Detected
EXTIG-30	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-31	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTIG-32	Top 0-0.5" of Concrete at base of building, directly under caulk	None Detected

ATTACHMENT B

**REVISED PCB EXTERIOR BUILDING
MATERIALS SAMPLE LOCATION MAP**

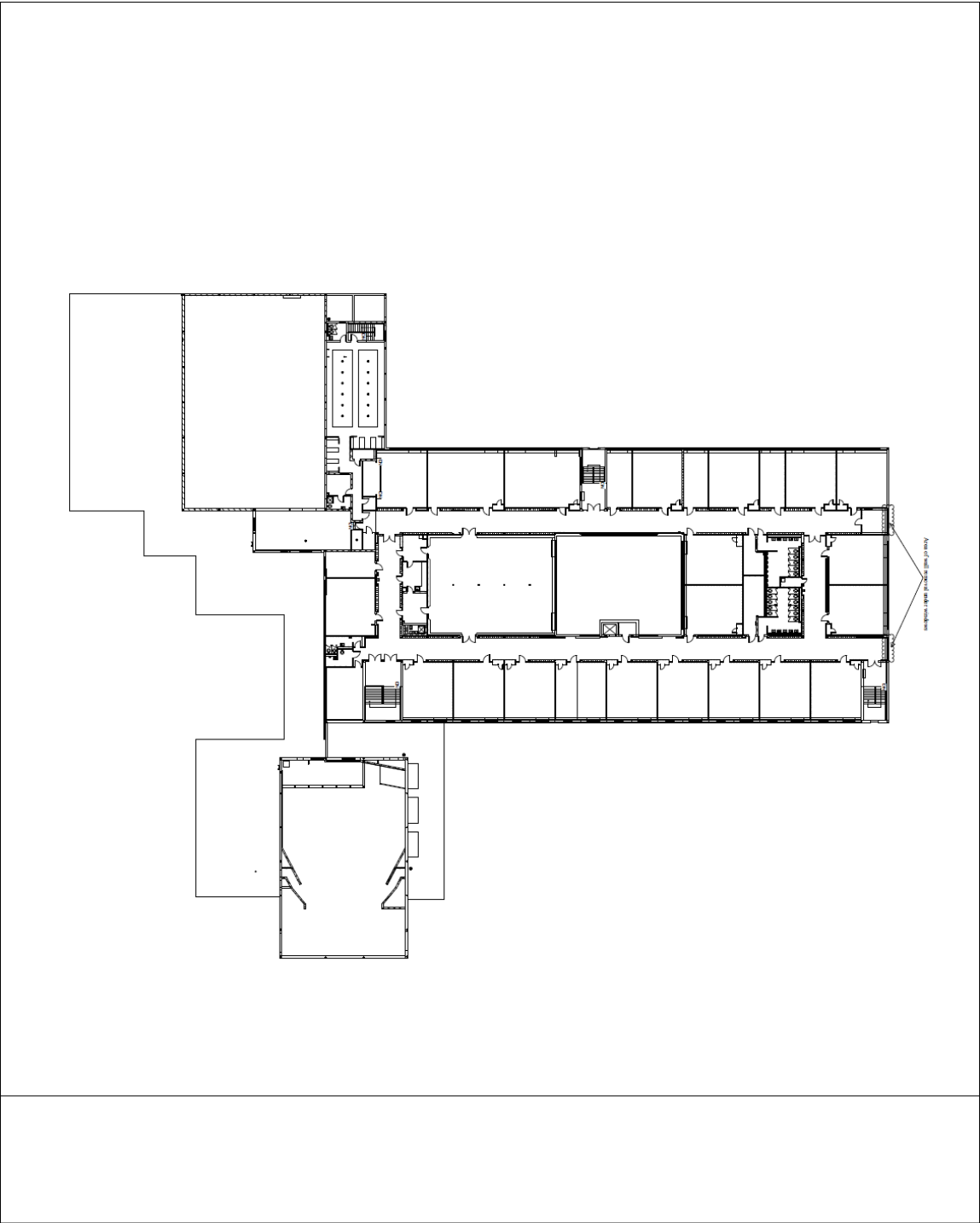


ATTACHMENT C

**REVISED SOURCE MATERIAL SAMPLE
LOCATION MAP FOR GROUND LEVEL**

ATTACHMENT D

**EXISTING EXTERIOR WALL LAYOUT
& PCB REMOVAL LOCATIONS**



FLETCHER-THOMPSON
 100 FLETCHER STREET, SUITE 100
 BOSTON, MA 02114
 TEL: 617.552.1200
 FAX: 617.552.1201
 WWW.FLETCHER-THOMPSON.COM

PROJECT NAME: EXTERIOR WALL AND MAINTENANCE
PROJECT NO.: 100-100-100
DATE: 10/10/2010
SCALE: 1/8" = 1'-0"

DESIGNED BY: JENNIFER A. DEPAOLIS
PROJECT MANAGER: JENNIFER A. DEPAOLIS
ARCHITECT: JENNIFER A. DEPAOLIS

REVISIONS:

NO.	DATE	DESCRIPTION
1	10/10/2010	ISSUED FOR PERMIT
2	10/10/2010	ISSUED FOR PERMIT
3	10/10/2010	ISSUED FOR PERMIT
4	10/10/2010	ISSUED FOR PERMIT
5	10/10/2010	ISSUED FOR PERMIT
6	10/10/2010	ISSUED FOR PERMIT
7	10/10/2010	ISSUED FOR PERMIT
8	10/10/2010	ISSUED FOR PERMIT
9	10/10/2010	ISSUED FOR PERMIT
10	10/10/2010	ISSUED FOR PERMIT
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12	10/10/2010	ISSUED FOR PERMIT
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100	10/10/2010	ISSUED FOR PERMIT

